UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS MUTUAL PROTECTIONS AND INDEMNITY ASSOCIATION, INC.

Plaintiff,

-against-

Alcoa Steamship Co., Inc. and the Other Entities Listed on Exhibit A hereto,

Defendants.

NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE

04 Civ: 04309 (LAK)

2004 SEP 22 MHII: 08

TO: Lawrence J. Bowles, Esq.
Nourse & Bowles, LLP
One Exchange Plaza at 55 Broadway
New York, NY 10006-3030

and

All Counsel of Record and All Defendants.

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto we will move this Court before the Honorable Lewis A. Kaplan at the United States Courthouse for the Eastern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of The Maritime Asbestosis Legal Clinic, a division of The Jaques Admiralty Law Firm and a member of good standing of the Bar of the State(s) of Michigan, as attorney pro hac vice to argue

or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,

ALAN KELLMAN

The Maritime Asbestosis Legal Clinic, a division of The Jaques Admiralty Law Firm 645 Griswold, Ste. 1570 Detroit, MI 48226 akellman@jaquesadmiralty.com (313) 961-1080

Dated: September 15, 2004

SOUTHERN DISTRICT OF NEW YORK

-----X

AMERICAN STEAMSHIP OWNERS :

MUTUAL PROTECTIONS AND : 04 Civ: 04309 (LAK)

INDEMNITY ASSOCIATION, INC. :

Plaintiff,

: AFFIDAVIT OF ALAN

: KELLMAN IN SUPPORT

: OF MOTION TO ADMIT

: COUNSEL PRO HAC VICE

Alcoa Steamship Co., Inc. and the Other Entities Listed on Exhibit A hereto,

UNITED STATES DISTRICT COURT

-against-

Defendants.

Alan Kellman, being duly sworn, hereby deposes and says as follows:

- I am a partner with The Maritime Asbestosis Legal Clinic, a division of The
 Jaques Admiralty Law Firm.
- 2. I submit this affidavit in support of my motion to practice pro hac vice in the above captioned matter.
- 3. As shown in the Certificate(s) of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Michigan.
- 4. There are no pending disciplinary proceedings against me in any State of Federal court.

State Var of Michigan





This certifies that Alan Kellman, P15826 of Detroit, Michigan is an active member of the State Bar of Michigan in good standing. He was admitted to practice in Michigan on December 17, 1969 in Wayne County.

Chad Sluss Member Services September 10, 2004 UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS

MUTUAL PROTECTIONS AND :

INDEMNITY ASSOCIATION, INC.

Plaintiff,

AFFIDAVIT OF SERVICE

04 Civ: 04309 (LAK)

-against-

Alcoa Steamship Co., Inc.

and the Other Entities Listed on Exhibit A

hereto,

Defendants.

AFFIDAVIT OF SERVICE

I hereby certify that true and correct copies of the foregoing Motion to Intervene and Proposed Order, Memo in Support of Motion to Intervene, Affidavit of Alan Kellman In Support of Motion to Admit Counsel Pro Hac Vice, Admission to Pro Hac Vice, Notice of Motion to Admit Pro Hac Vice and this Affidavit of Service were served First Class, postage pre-paid, U.S. Mail this 16th day of September, 2004, upon attached service list:

JULIE DANAHEI

Sworn to and Subscribed Before me this 20 day

Notary Public

DAWN M. ARNETT NOTARY PUBLIC WAYNE CO., MI NY COMMISSION EXPIRES Feb 14, 2005 Academy Tankers, Inc.
Canterbury Shipping Corp.
Nation Oil Transportation Co.
c/o Secretary of State
Townsend Building
Dover, DE 19901

Alcoa Steamship Co., Inc. as Successor to Lib-Ore Steamship Company, Inc. Pan-Ore Transportation, Inc. Reynolds Metals Company 201 Isabella Street Pittsburgh, PA 15212

Amerada Hess as Successor to Hess Oil and Chemical Corp. 1185 Avenue of the Americas New York, NY 10036

American Maritime Holdings, Inc. 39 Broadway New York, NY 10006

American Maritime Holdings, Inc. Sea Mobility Inc. World Wide Tankers, Inc. c/o US Corporation Company 2711 Centerville Road, Suite 400 Wilmington, DE 19808

APL, Ltd. as Successor to American Mail Line American President Lines, Inc. 1111 Broadway Street, 6th floor Oakland, CA 94607 American Steamship Company 500 Essjay Road Williamsville, NY 14222

Apex Oil Co., Inc. 8182 Maryland Avenue St. Louis, MO 63105 Apex Oil Co., Inc. 3314 River Rand Road P.O. Box 3127 Wilmington, NC 28403

Aremar C.I.F.S.A. Viamonte 494 9 Piso Buenos Aires, Argentina

Argosy Offshore Ltd. c/o CT Corporation System 8550 United Plaza Blvd. Baton Rouge, LA 70809

Arpez A.A. Calle Venezuela 110 1095 Buenos Aires, Argentina

Astra Compania Argentina de Petroleo S.A. Tucuman 744 11th floor 1049 Buenos Aires, Argentina

Alantic Richfield Company 515 South Fowler Street P.O. Box 2679 Los Angeles, CA 90071

Atlantic Richfield Indonesia Inc. Landmark Center Tower B Jl. Jenderal Sudirman Kav. 70A P.O. Box 1063 12910 Jakarta Java, Indonesia

Avila y Pizarro Compania Ltda. Agents for Van Gogh Inversiones SA Blanco 570 Valparaiso Chile

Avon Steamship Co. Inc. Agents for Amherst Shipping Inc. 410 Lakeville Road, Rm. 201 Lake Success, NY 11040

Barber Asphalt Corp.

c\o CT Corporation System. 277 Park Avenue New York, NY 10017

Bermuda Atlantic Line Ltd. P.O. Box 1198 Hamilton 5, Bermuda

Bermuda Atlantic Line Ltd. 760 N.E. 7th Avenue Dania, FL 33004

Bessemer Trust Co. as Successor to Howard Phipps, Ogden Phipps, David Layman, Jr., Bessemer Trust Co., Bessemer Securities Corp. Grosvenor-Dale Co., Inc. 630 Fifth Avenue New York, NY 10111-0333

BP as Successors to American Oil Company Standard Oil Company Sohio Alaskan Petroleum Co. and SPC Shipping Inc. 28100 Torch Parkway Warrenville, IL 60555

Bridgeport & Port Jefferson Steamboat Co. 102 West Broadway Port Jefferson, NY 11777

Brokerage & Management Corp. 90 Broad Street, 24th floor New York, NY 10004

Caribbean Steamship Co. S.A. P.O. Box 2568 Corpus Christi, TX 78403

Central Gulf Lines as Successor to Central Gulf Lighters
Poydras Center
680 Poydras St., Ste.1700, P.O. Box53366
New Orleans, LA 70153
Chevron Texaco Corporation as Successor to California Oil Comapny
6001 Bollinger Canyon Rd.
San Ramon, CA 94583

Cleveland-Cliffs, Inc. as Successor to Cleveland-Cliffs Steamship Company . 1100 Superior Avenue Cleveland, OH 44114

Coal Logistics Corporation 30 Skyline Drive Lake Mary, FL 32795

Coastal Carriers Inc. 1607 Belle Chasse Highway Belle Chasse, LA 70037

Coastal Carriers Inc. c/o Clayton Ragas 216 Ft. Jackson Street Belle Chasse, LA 70037

Companhia de Navegacao Maritimea Netumar Avenida Presidente Vargas 482 22 Andar Rio de Janeiro, 2000RJ Brazil Crest Tankers Inc. 8182 Maryland Avenue St. Louis, MO 63105

Dillingham Construction World Headquarters 1020 Serpentine Lane Suite 110 Pleasanton, CA 94566

The Dow Chemical Company 2030 Dow Center Midland, MI 48674

Carolyn S. Schwartz, Esq.
Office of the United States Trustee of Enron Corporation
33 Whitehall Street, 21st Floor
New York, NY 10004

Empressa de Navegacion El Faro Calle Lavalle 388 1047 Buenos Aires, Argentina

Equistar Chemicals, LP as Successor to Cuba Distilling Company National Distillers Products Corp. 300 Doremus Avenue Newark, NJ 07105 Euro Gulf International c/0 Diamond State Corp. Agents Inc. 1200 North Broom Street Wilmington, DE 19806

Federal Transport Company, Inc. c/o Del Monte Fresh Produce Company P.O. Box 149222 Coral Gables, FL 33114

Foss Maritime Company c/o Mario Aita Garvey Schubert and Barer 599 Broadway, 8th Floor New York, NY 10012

Georgia-Pacific Corporation 133 Peachtree Street, NE Atlanta, GA 30303

Georgia-Pacific Corporation 133 Peachtree Street, NE Atlanta, GA 30303

Global Bulk Transport, Inc. 280 Park Avenue New York, NY 10017

Grace Lines, Inc./Prudential Lines, Inc. c/o PLI Disbursement Trustee
Lee J. DiCola, Esq.
2800 Carrington Street NW
North Canton, OH 44720

Gulf International Marine Inc. c/o Gil Anthony Hebert 437 Menard Road Houma, LA 70360

Henry Corporation P.O. Box 13228 Tampa, FL 33681-3228

Inland Lakes Management Inc. 112 West Chisolm P.O. Box 646 Alpena, MI 49707 Ispat Inland, Inc. 3210 Watling Street
East Chicago, IN 46312

Keyspan Corporation as Successor to Eastern Gas and Fuel Associates 1 Metrotech Center Brooklyn, NY 11201

Keystone Shipping Co. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Baldbutte Shipping Company 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Chas. Kurz & Co., Inc. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Chestnut Shipping Corp. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Chilbar Shipping Co. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Fredericksburg Shipping co. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Keystone Tankship Corporation 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Margate Shipping Co. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

New England Collier Co. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Paco Tankers Inc. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004 Timbo Shipping Ltd. 1 Bala Plaza East, Suite 600 Bala Cynwyd, PA 19004

Kimberly-Clark Corporation as Successor to Scott Paper Company Dept. INT P.O. Box 2020 Neenah, WI 54957-2020

Kirby Inland Marine, Inc. as Successor to Hollywood Marine, Inc. 55 Waugh Drive, Suite 1000 Houston, TX 77007

Lafarge North America Inc. as Successor to Huron Transportation, Inc. 12950 Worldgate Drive, Suite 600 Herndon, VA 20170

Marifran International S.A. Calle Paraguay 577 4 Piso Buenos Aires, 1057 Argentina

Marifran International S.A. Avenida 25 de Mayo 401 1002 Buenos Aires, Argentina

Marine Transport Lines, Inc.
Managers for Marine Interests Corp.
and Union Marine Transport Co.
Agents for Marrine Chemical Navigation Corp.,
Marine Sulphur Shipping Corp. and Oswego Tanker Corp.
1200 Harbor Blvd., C-901
Weehawken, NJ 0708

Mathiasen's Tanker Industry, Inc. 8182 Maryland Ave. St. Louis, MO 63105

McAllister Brothers, Inc. as Successor to Outreach Marine Corporation 17 Battery Place, 15th floor New York, NY 10004

Mu-Petco Shipping Co., Inc., New Jersey Barging Corp. (Del) Texas City Refining Inc. c/o The Corporation Trust Co. Corporation Trust Center 1209 Orange Street Wilmington, DE 19801

National Gypsom Co. 2001 Rexford Rd. Charlotte, NC 28211

Nedbarges Sublift BV Westmolenstraat 1 Lange Haven, 3111 BS Schiedam Netherlands

Nicor Inc. as Successor to National Marine Service Inc., Lake Tankers Corp. 1209 Orange Street Wilmington, DE 19801

Companhia de Navegacao Maritima Netumar d/b/a/ Netumar Lines c/o Stacey L. Meisel, Esq.
Trustee in Bankruptcy
Becker Meisel LLC
Eisenhower Plaza II
345 Eisenhower Parkway, Suite 2800
Livingston, NJ 07039

Offshore Express Inc. 438 Menard Road P.O. Box 2666 Houma, LA 70361

Oglebay Norton as Successor to Columbia Steamship Company, Inc. North Point Tower 1001 Lakeside Avenue, 15th Floor Cleveland, OH 44114

Ormet Corporation 1233 Main Street, Suite 4000 Wheeling, WV 26003

Oscar Transportation Group 97 Akti Miaouli 185 38 Piraeus, Greece Puerto Rico Maritime Shipping Authority Building No. 123 Fleet and Bombay Streets Elizabeth, NJ 07208

Resolve Maritime Corporation 436 SW 8th Street, Suite 206 Miami, FL 33130

Resolve Maritime Corporation c/o Charles Lea Hume 25 W. Flagler Street 5th fl., City National Building Miami, FL 33130

Royal P&O Nedlloyd N.V. as Successor to Farrell Lines Inc. Farrel Lines (Lighters) One Meadowlands Parkway East Rutherford, NJ 07073

S.C. Loveland Co., Inc. c/o Edward V. Cattell, Jr. Hollstein Keating Cattell Johnston & Goldstein, P.C. 8 Penn Center, 1628 JFK Blvd. Ste. 2000 Philadelphia, PA 19103

Sabine Towing & Transportation Co., Inc. 7200 Highway 87 East Port Arthur, TX 77342

SEI II Equipment Management 745 7th Avenue New York, NY 10019

Seaport Harbor Cruise Lines, Inc. 17 Battery Place New York, NY 10004

Tecomar S.A. Avenida 39 Ote. No. 1204 A Col. Anzures Puebla, 72530 Mexico

Tecomar S.A. Benjamin Franklin 232 Mexico DF 11800 .

Texas City Refining Inc. P.O. Box 1271 Texas City, TX 77592-1271

Trade & Transport Inc. 61-65, Filonoa Street P.O. Box 104 Piraeus Greece

Tranfluen Compania Armadora SA 7°Piso,, Oficina 52 San Martin 50 1004 Buenos Aires Argentina

Transfrimar SA 6° Piso Colon 602 Guayaquil, Ecuador

Trinidad Corporation 8182 Maryland Avenue St. Louis, MO 63105

Tropigas Inc. 2151 LeJune Road Coral Gables, FL 33134

Union Carbide Corporation, A Subsidiary of The Dow Chemical Company P.O. Box 4393 Houston, TX 77210

Union Carbide Corp. 100 Lighting Way, Suite 402 Secaucus, NJ 07094

United States Maritime Administration U.S. Department of Transportation 400 7th Street, SW Washington, D.C. 20590

John T. Paulyson, Trustee

United States Lines, Inc. & United States Lines (S.A.) Inc. 184-186 North Avenue East, Suite 103 Cranford, NJ 07015-2488 Verizon Communications as Successor to New York Telephone 1095 Avenue of the Americas New York, NY 10036

Waterman Steamship Corp. One Whitehall Street New York, NY 10004

Weeks Marine Inc. as Successor to American Dredging Company 4 Commerce Drive Cranford, NJ 07016

West India Shipping Co., Inc. Agents for West India Industries, Inc. 18th Fl., Great Southwest Building 1314 Texas Street Houston, TX 77002

Lawrence J. Bowles Nourse & Bowles One Exchange Plaza/55 Broadway New York, NY 10006

Seth Schafler, Esq. Proskauer Rose, LLP 1585 Broadway New York, NY 10036-8299